

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

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*Counsel for Debtor-in-Possession
Nostrum Laboratories, Inc.*

In re:

NOSTRUM LABORATORIES, INC.,

Debtor.

Case No.: 24-19611

Chapter 11

Honorable John K. Sherwood, U.S.B.J.

**NOTICE OF DEBTOR'S MOTION PURSUANT TO SECTIONS 105(a), 363 AND 365 OF
THE BANKRUPTCY CODE AND BANKRUPTCY RULES 2002, 6004 AND 6006 FOR
AN ORDER APPROVING THE SALE OF DEBTOR'S ASSETS FREE AND CLEAR OF
LIENS, CLAIMS AND ENCUMBRANCES AND THE ASSUMPTION AND
ASSIGNMENT OF EXECUTORY CONTRACTS**

PLEASE TAKE NOTICE that soon as counsel may be heard, the undersigned will move before

the Honorable John K. Sherwood, U.S.B.J., at the United States Bankruptcy Court, 50
Walnut Street, 3rd Floor, Newark, New Jersey 07102, Courtroom 3D for the entry of an order
granting this Motion for an order approving the sale of Debtor's assets free and clear of liens,
claims and encumbrances and the assumption and assignment of executory contracts pursuant to
Sections 105(a), 363 and 365 of the Bankruptcy Code and Fed. R. Bankr. 2002, 6004 and 6006
(the "Motion").

PLEASE TAKE FURTHER NOTICE that the Debtor shall rely upon the Application
filed in support of the Motion. The Debtor submits herewith no brief or memorandum of law in
connection with this motion, there being no disputed questions of law involved, and the controlling

principles of law being set forth in the Application. If a disputed question of law should arise on the return date of the motion, the movant further reserves the right to file a brief or memorandum of law in accordance with any schedule set by the Court.

A proposed form of Order also accompanies this Motion.

PLEASE TAKE FURTHER NOTICE that in the event that no party in interest objects to the Motion, the requested relief may be granted by the Court without further notice.

PLEASE TAKE FURTHER NOTICE that higher and better offers for any or all of the assets may be made and will be considered at the hearing and that, if you are a bidder, you should attend or risk being outbid.

Broege, Neumann, Fischer & Shaver, LLC
*Counsel for Debtor-in-Possession Nostrum
Laboratories, Inc.*

By: /s/ Timothy P. Neumann, Esq.
Timothy P. Neumann, Esq.

Date: April 4, 2025